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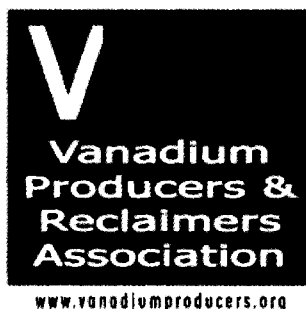
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COMMENTS:

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October 8, 2010

Hand Delivery

Document Processing Center (7407M)
EPA East - Room 6428
Attn: 8(e) Coordinator
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302



Re: TSCA 8(e) Submission for Vanadium Trioxide (CASRN 1314-34-7)

Dear Sir or Madam:

The Vanadium Producers & Reclaimers Association (VPRA) hereby submits to the United States Environmental Protection Agency (EPA) a Toxic Substances Control Act (TSCA) section 8(e), 15 U.S.C. § 2607(e), submission for preliminary results from an acute inhalation toxicity study on vanadium trioxide (V_2O_3). This filing is part of a systematic investigation to establish acute toxicology LC_{50} cut-off values (mg/L) for several vanadium compounds. These substances have not previously been subject to this kind of testing and results are being generated within a range of acute exposure levels that EPA advises should be considered for 8(e) reporting. As a result, several 8(e) filings have been made already in conjunction with this systematic testing program.

More specifically, the data being submitted today are the most recent results from a single study to establish an LC_{50} cut-off value for vanadium trioxide. Previous reporting results in rats and mice were filed on May 13, 2010 and August 5, 2010 and addressed higher acute exposure levels. In contrast, only female mice were tested at the dose level being reported of 0.5 mg/L.

The data being reported on female mice were received on September 8, 2010 by VPRA members who manufacture this substance. The results suggest an LC_{50} value of between 1 mg/L and 0.5 mg/L for V_2O_3 . These results indicate that no further acute inhalation testing is needed for this compound. The data being reported are as follows:



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V₂O₃ Acute Nose-Only Inhalation Study Results – Mice					
Test Conc. (mg/L)	Total Deaths	Animal Number	Day of Death	Clinical Signs (number of animals with finding)	Necropsy Findings
0.5 (0.51)	Females 2/6	41		Normal (6)	No Gross Lesions
		42		Skin/Fur Discolored: head, black (6)	No Gross Lesions
		43			No Gross Lesions
		44	4	Wet inguinal fur (5)	No Gross Lesions
		45		Hypoactive (2)	No Gross Lesions
		46	4		No Gross Lesions

No acute toxicity data have previously been publicly available for this substance at the 0.5 mg/L exposure level in mice, so these data represent new information for this substance.

Sincerely yours,



John Hilbert, President
Vanadium Producers & Reclaimers Association